

## North Carolina Department of Human Resources

Western Regional Office • Black Mountain 28711

James G. Martin, Governor

Phillip J. Kirk, Jr., Secretary

April 4, 1985

TO: Bill Meyer, Head  
Solid & Hazardous Waste Mgt.

FROM: J. E. Patterson *JEP*  
Waste Management Specialist

RE: Removal of Underground Hazardous Waste Storage  
Tank and Underground Raw Material Tank (both of  
which have contained perchloroethylene) at Asheville  
Dyeing and Finishing Company, Swannanoa, NC

Asheville Dyeing and Finishing Company has been a generator of hazardous waste due to a dry cleaning process. They have, at this point in time, discontinued this process, shipped off all wastes, and dug up both the waste and raw material tanks. They have requested to be deleted as a generator of hazardous waste.

On checking with Keith Lawson, he told me that the tanks should be thoroughly rinsed with detergent and water before they are transported offsite by Southern Pump and Tank Company. He also stated that the waste rinsed from the tanks should be disposed of either through MSD (with their permission) or by shipping the waste to an approved disposal site.

Mr. Clyde Roberts, engineer at Asheville Dyeing and Finishing, took soil samples from the bottom of the tank holes and has submitted them to Environmental Testing in Asheville for analysis.

I visited Asheville Dyeing and Finishing on the morning of Saturday, March 23rd to observe the removal of the tanks. The waste tank (2,000 gallon) and the raw material tank (4,000 gallon) were both treated with tar and seemed to be intact. There were no obvious odors in the soil around or under the tanks.

I will notify the Raleigh office when the analysis of the samples is completed. If further action or follow-up is needed, please advise.

JEP/dgh

cc: Keith Lawson  
Jerry Rhodes  
Julian Foscue



North Carolina Department of Human Resources  
Division of Health Services  
P.O. Box 2091 • Raleigh, North Carolina 27602-2091

James G. Martin, Governor  
Phillip J. Kirk, Jr., Secretary

Ronald H. Levine, M.D., M.P.H.  
State Health Director  
919/733-3446

April 16, 1985

CLYDE ROBERTS  
Asheville Dyeing and Finishing  
P.O. Box 337  
Swannanoa, NC 28778  
EPA NUMBER: NCD070619663

6

Dear Mr. Roberts:

The United States Environmental Protection Agency has granted the State of North Carolina Interim Authorization for Phase II Components A and B to operate the State's Hazardous Waste Management Program in lieu of the Federal Program under the RCRA.

Section 3007(a) authorizes access to facilities which handle hazardous waste. Access is granted to 'duly designated' officers or employees of the EPA (or State, if that State has a hazardous waste program authorized under section 3006 of the Act.)

Pursuant to section 3006 and N.C.G.S. 130-166.18, an inspection was conducted 01/29/85 by Mr. JAMES PATTERSON, Solid and Hazardous Waste Management Branch. No violations were observed. The inspection did not include a review of the Financial or Ground Water monitoring requirements, if applicable. This office wishes to thank you for your cooperation. Please do not hesitate to contact us if we may be of future assistance.

Sincerely,

A handwritten signature in dark ink, appearing to read "W. Paige".

William Paige  
Environmental Engineer  
Solid and Hazardous Waste  
Management Branch  
Environmental Health Section

copy: JAMES PATTERSON



Ronald H. Levine, M.D., M.P.H.  
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES  
P.O. Box 2091  
Raleigh, N.C. 27602-2091

Date: 1/30/85

Inspector: James E. Patterson

Section I. General Information

COMPANY NAME:

Asheville Dyeing + FINISHING CO.  
Spartanburg (City)

5

EPA ID No.:

NCD 070 619 683

INSPECTION/ACTION DATE:

1/29/85

CONTACT:

CLYDE ROBERTS  
(print)

Section II. RCRA Classification

☒ Generator; ( ) Transporter; ( ) Interim Status-TSDF; ( ) Final Status-TSDF

Section III. Inspection/Action Classification

( ) Initial Annual ( Gen, Trans.); ( ) Initial Semi-annual (TSDF); ☒ Re-inspection

Section IV. Action Codes

☒ Compliance Inspection; ( ) Sampling Inspection; ( ) Compliance Order Inspection; ( ) Non-notifier Inspection; ( ) Overview Inspection; ( ) Complaint Inspection; ( ) Record Review; ( ) Comprehensive Groundwater Evaluation; ( ) Negotiation Meeting; ( ) Informal Settlement Agreement; ( ) State Order - (Consent, Administrative, etc.); ( ) Hearing; ( ) Penalty Assessed; ( ) Penalty Collected; ( ) Civil Action; ( ) Criminal Action

Section V. Compliance Status

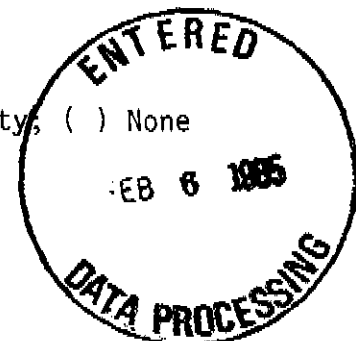
☒ In Compliance; ( ) In Violation; ( ) All Previous Violation Existing; ( ) Previous Violations Corrected - But New Ones Exist; ( ) Previous Violation Existing Along With Additional Ones.

Section VI. Letter Action

( ) NOV; ( ) CO; ☒ In Compliance; ( ) Penalty; ( ) None

Section VII. Compliance Date

                      
mo/day/yr



FOR RALEIGH OFFICE USE ONLY:

I. ( ) I II. Compliance Order Date  
( ) G  
( ) F  
( ) C

                      
mo/day/yr

DHS 3218 Rev. 10/84  
Solid & Hazardous Waste

GENERATOR INSPECTION FORM - PART 262

Name of Site Asheville Dyeing + Finishing Co. EPA I.D. NCD 07D 619 633 Buncombe County  
 Location OLD FARM SCHOOL RD. Inspection Date 1-29-85  
 Compliance Date \_\_\_\_\_ Signature of Inspector(s) James E. Patten  
 Signature of Facility Contact Phyllis Roberts

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

SUBPART A - GENERAL

SUBPART C - PRE-TRANSPORT REQUIREMENTS

1. Hazardous Waste Determination (262.11)
  - ☐ Subpart D waste (b)
  - ☐ Subpart C waste (c)(1)(2)
2. EPA Identification Numbers
  - ☐ EPA generator number (a)
  - ☐ EPA transporter/facility (c)

7. Packaging (262.30)
  - ☐ D.O.T. compliance
8. Labeling (262.31)
  - ☐ D.O.T. compliance
9. Marking (262.32)
  - ☐ D.O.T. compliance (a)
  - ☐ "HAZARDOUS WASTE" label (b)

SUBPART B - THE MANIFEST

10. Placarding (262.33)
  - ☐ D.O.T. compliance

3. General Requirements (262.20)
  - ☐ proper manifest (a)
  - ☐ permitted facility (b)
4. Required Information (262.21)
  - ☐ document number (a)(1)
  - ☐ generator identification (a)(2)
  - ☐ transporter identification (a)(3)
  - ☐ facility identification (a)(4)
  - ☐ D.O.T. description (a)(5)
  - ☐ total quantity (a)(6)
  - ☐ certification (b)

11. Accumulation Time (262.34)
  - ☐ Subpart I; J (a)(1)
  - ☐ accumulation date (a)(2)
  - ☐ "Hazardous Waste" (a)(3)
  - ☐ Subpart C; D (a)(4)\*
  - ☐ personnel training (a)(4)\*

\*Cite specific violations of 40 CFR 265 under remarks

SUBPART D - RECORDKEEPING AND REPORTING

5. Number of Copies (262.22)
  - ☐ minimum number
6. Use of the Manifest (262.23)
  - ☐ generator handwritten signature (a)(1)
  - ☐ transporter signature/date (a)(2)
  - ☐ retain copy (a)(3)
  - ☐ copies to transporter (b)

12. Recordkeeping (262.40)
  - ☐ manifest retention (a)
  - ☐ annual/exception report (b)
  - ☐ test/waste analysis (c)

## 13. Annual Reporting (262.41)

☐ submitted (a)(1-6)☐ submitted (b)

## 14. Exception Reporting (262.42)

☐ transporter contact (a)☐ exception report (b)(1)(2)

REMARKS:

## CONTAINER/TANK INSPECTION FORM - PART 265

Asheville Dyeing + Finishing Co. NCD 070 619 633 1-29-85  
 Name of Site EPA I.D. Inspection Date

## SUBPART I - USE AND MANAGEMENT OF CONTAINERS

## 1. Condition Of Containers (265.171)

- ☐ leakage  
☐ past leakage (evidence)  
☐ severe rusting  
☐ structural defect

## 2. Compatibility Of Waste With Containers (265.172)

- ☐ visual evidence of noncompliance  
 (leakage, corrosion)

## 3. Management of Containers (265.173)

- ☐ closed (a)  
☐ improper handling or storage (b)

## 4. Inspections (265.174)

- ☐ weekly (minimum)

## 5. Special Requirements For Ignitable or Reactive Waste (265.176)

- ☐ 15m (50 ft)

## 6. Special Requirements For Incompatible Waste (265.177)

- ☐ mixing (a)  
☐ unwashed container (b)  
☐ separation (c)

## SUBPART J - TANKS

## 1. General Operating Requirements (265.192)

- ☐ compatibility (a)(b)  
☐ uncovered tank precautions (c)  
☐ overflow prevention (d)

## 2. Waste Analysis and Trial Tests (265.193)\*

- \*Section not applicable to a generator only  
☐ waste analysis/trial test

## 3. Inspections (265.194)

- ☐ discharge control equipment (a)(1)  
☐ monitoring equipment (a)(2)  
☐ waste level (a)(3)  
☐ construction material (a)(4)  
☐ surrounding area (a)(5)  
☐ assessment schedule/procedures (b)

## 4. Closure (265.197)

- ☐ plan on-site

## 5. Special Requirements For Ignitable Or Reactive Waste (265.198)

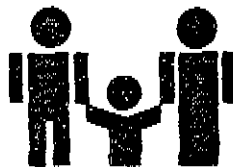
- ☐ properly stored (a)(1)(2)(3)  
☐ buffer requirements (b)

## 6. Special Requirements For Incompatible Wastes (265.199)

- ☐ properly stored (a)  
☐ tank washed (b)

## REMARKS:

TANK has been Empty and disconnected - no wastes  
are being generated + process has been discontinued -  
THANKS TO BE REMOVED



Ronald H. Levine, M.D., M.P.H.  
STATE HEALTH DIRECTOR

DIVISION OF HEALTH SERVICES  
P.O. Box 2091  
Raleigh, N.C. 27602-2091

December 10, 1984

4

Mr. Clyde Roberts  
Asheville Dyeing and Finishing, Inc.  
P.O. Box 337  
Swannanoa, N.C. 28778

Dear Mr. Roberts:

The United States Environmental Protection Agency has granted the State of North Carolina Interim Authorization for Phase II Components A and B to operate the State's Hazardous Waste Management Program in lieu of the Federal Program under the RCRA.

Section 3007(a) authorizes access to facilities which handle hazardous waste. Access is granted to 'duly designated' officers or employees of the EPA (or State, if that State has a hazardous waste program authorized under section 3006 of the Act.)

Pursuant to section 3006 and N.C.G.S. 130-166.18, an inspection was conducted 11/08/84 by Mr. James E. Patterson, Solid and Hazardous Waste Management Branch. The inspection revealed noncompliance in several areas. Attached is a copy of the inspection report which denotes the deficiencies.

A compliance date of 01/09/84 has been established for the correction of these deficiencies. If you have any questions pertaining to this subject, please contact Mr. William Paige, Environmental Engineer, at (919) 733-2178.

Sincerely,

O. W. Strickland, Head  
Solid & Hazardous Waste Management Branch  
Environmental Health Section

OWS:nlp

cc: Mr. James Patterson

Ronald H. Levine, M.D., M.P.H.  
STATE HEALTH DIRECTOR



GENERATOR INSPECTION FORM - PART 262

Asheville Dyeing and Finishing Inc. APPLIED FOR Bancombe  
 Name of Site P.O. Box 337 EPA I.D. \_\_\_\_\_ County  
Farm School Rd, Swannanoa, N.C. 11/8/84  
 Location Inspection Date  
Jan. 9, 1985  
 Compliance Date Signature of Inspector(s) James Edward Patterson  
 Signature of Facility Contact Charles Roberts

An inspection of your facility has been made this date and you are notified of the violations, if any, marked below with a cross (X).

SUBPART A - GENERAL

1. Hazardous Waste Determination (262.11)  
☐ Subpart D waste (b)  
☐ Subpart C waste (c)(1)(2)

2. EPA Identification Numbers  
☒ EPA generator number (a)  
☐ EPA transporter/facility (c)

SUBPART B - THE MANIFEST

3. General Requirements (262.20)  
☒ proper manifest (a)  
☒ permitted facility (b)

4. Required Information (262.21)  
☒ document number (a)(1)  
☒ generator identification (a)(2)  
☒ transporter identification (a)(3)  
☒ facility identification (a)(4)  
☒ D.O.T. description (a)(5)  
☒ total quantity (a)(6)  
☒ certification (b)

5. Number of Copies (262.22)  
☒ minimum number

6. Use of the Manifest (262.23)  
☒ generator handwritten signature (a)(1)  
☒ transporter signature/date (a)(2)  
☒ retain copy (a)(3)  
☒ copies to transporter (b)

SUBPART C - PRE-TRANSPORT REQUIREMENTS

7. Packaging (262.30)  
☐ D.O.T. compliance
8. Labeling (262.31)  
☐ D.O.T. compliance
9. Marking (262.32)  
☐ D.O.T. compliance (a)  
☒ "HAZARDOUS WASTE" label (b)

10. Placarding (262.33)  
☐ D.O.T. compliance

11. Accumulation Time (262.34)

- ☒ Subpart I; J (a)(1)  
☒ accumulation date (a)(2) WASTE STORED over 90 days  
☒ "Hazardous Waste" (a)(3)  
☒ Subpart C; D (a)(4)\*  
☒ personnel training (a)(4)\*

\*Cite specific violations of 40 CFR 265 under remarks

SUBPART D - RECORDKEEPING AND REPORTING

12. Recordkeeping (262.40)  
☐ manifest retention (a)  
☐ annual/exception report (b)  
☐ test/waste analysis (c)

## 13. Annual Reporting (262.41)

☐ submitted (a)(1-6)☐ submitted (b)

## 14. Exception Reporting (262.42)

☐ transporter contact (a)☐ exception report (b)(1)(2)

## REMARKS:

~~Subject ~~XXXX~~~~

262.34 Support C+D - contingency plan (ALL)

262.34 personnel training - (265.1b all parts)

CONTAINER/TANK INSPECTION FORM - PART 265

Name of Site Asheville Dyeing and Finishing Co EPA I.D. ADPHED FOR Inspection Date 11/18/84

SUBPART I - USE AND MANAGEMENT OF CONTAINERS

1. Condition Of Containers (265.171)
  - ☐ leakage
  - ☐ past leakage (evidence)
  - ☐ severe rusting
  - ☐ structural defect
2. Compatibility Of Waste With Containers (265.172)
  - ☐ visual evidence of noncompliance (leakage, corrosion)
3. Management of Containers (265.173)
  - ☐ closed (a)
  - ☐ improper handling or storage (b)
4. Inspections (265.174)
  - ☐ weekly (minimum)
5. Special Requirements For Ignitable or Reactive Waste (265.176)
  - ☐ 15m (50 ft)
6. Special Requirements For Incompatible Waste (265.177)
  - ☐ mixing (a)
  - ☐ unwashed container (b)
  - ☐ separation (c)

SUBPART J - TANKS

1. General Operating Requirements (265.192)
  - ☐ compatibility (a)(b)
  - ☐ uncovered tank precautions (c)
  - ☐ overflow prevention (d)
2. Waste Analysis and Trial Tests (265.193)\*
  - \*Section not applicable to a generator only
  - ☐ waste analysis/trial test
3. Inspections (265.194)
  - ☐ discharge control equipment (a)(1)
  - ☐ monitoring equipment (a)(2)
  - ☒ waste level (a)(3)
  - ☐ construction material (a)(4)
  - ☐ surrounding area (a)(5)
  - ☐ assessment schedule/procedures (b)
4. Closure (265.197)
  - ☐ plan on-site
5. Special Requirements For Ignitable Or Reactive Waste (265.198)
  - ☐ properly stored (a)(1)(2)(3)
  - ☐ buffer requirements (b)
6. Special Requirements For Incompatible Wastes (265.199)
  - ☐ properly stored (a)
  - ☐ tank washed (b)

REMARKS: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_